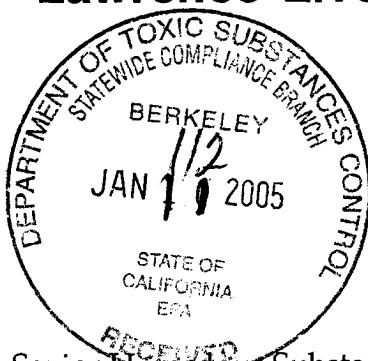




# Lawrence Livermore National Laboratory



*Environmental Protection Department*

January 14, 2005

Ms. Luz Castillo, Senior Hazardous Substances Scientist  
Statewide Compliance Division  
Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, CA 94710-2737

**SUBJECT: Response to Three Additional 2004 CEI Class I Violations  
Livermore Main Site (EPA ID# CA2890012584)  
Lawrence Livermore National Laboratory (LLNL)**

Dear Ms. Castillo:

This letter is submitted as a response to the three Class I Violations, dated December 7, 2004, which LLNL received on December 16, 2004. The three violations cited in your letter are from the 2004 Compliance Evaluation Inspection (CEI) by the Department of Toxic Substances Control (DTSC). DTSC personnel conducted the 2004 CEI at LLNL's Livermore Site hazardous waste management facilities on May 27 and 28, and June 1, 2, and 3, 2004.

In response to the first Class I Violation, item #3, "Certifying Prohibited Waste for Land Disposal without Meeting Treatment Standards," LLNL is attaching Data Quality Objectives (DQO) Procedure (WIC-140) prepared in July 2004 and implemented in September 2004. Additionally, LLNL has provided specific responses to the following three issues raised in this violation: how LLNL will ensure timely and accurate hazardous waste characterization, interpretation, and validation of analytical results; the necessary steps being taken to prevent recurrence of similar incidents in the future; and documentation that Envirocare will treat waste W209971 to meet land disposal restrictions (LDR) treatment standards prior to disposal into the land. See Attachment 1 for LLNL's responses to these three issues and for a copy of procedure WIC-140.

In response to the second Class I Violation, item #4, "Failure to Comply with Waste Analysis Plan," LLNL is submitting Attachment 2, which summarizes how it will ensure timely and accurate hazardous waste characterization, interpretation, and validation of analytical results.

Attachment 3 contains a response to the third Class I Violation, item #5, "Storage Greater than One Year." LLNL will use the 10-month cut-off point to allow time for notifying DTSC that it is requesting continued storage of mixed wastes meeting LDR standards at least 30 days prior to the waste reaching the one-year allowable limit in the Hazardous Waste Facility Permit (HWFP).

PRA05-001  
January 14, 2005

Ms. Luz Castillo

**Subject: Response to the 2004 CEI Class I Summary of Violations  
Livermore Main Site (EPA ID# CA2890012584)  
Lawrence Livermore National Laboratory (LLNL)**

Regarding the Sorting Table (Violation 1, "Treatment of Hazardous Waste in Unauthorized Unit"), LLNL received DTSC approval in a letter dated December 16, 2004, to use the Sorting Table. Consequently, LLNL is again requesting the Sorting Table violation be rescinded or reduced to a minor violation. The DTSC approval letter is included as Attachment 4.

Please contact me at (925) 422-3985 if you have any questions regarding these responses.

Sincerely,

(Original signed by Ellen  
Raber)

Department Head

ER/PY:jn

**Attachments:**

- Attachment 1: Documentation supporting the response to violation item #3, "Certifying Prohibited Waste for Land Disposal without Meeting Treatment Standards."
- Attachment 2: Documents supporting LLNL's response to violation item #4, "Failure to Comply with the Waste Analysis Plan."
- Attachment 3: Documents supporting LLNL's response to violation item #5, "Storage Greater than One Year."
- Attachment 4: DTSC approval letter authorizing the use of Sorting Table.